

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

EDWARD BASES and  
JOHN PACILIO

No. 18 CR 48

Judge John Z. Lee

**MOTION TO SEAL**

The United States of America, by ROBERT A. ZINK, Chief of the Fraud Section, Criminal Division, respectfully requests permission to file a forthcoming motion under seal and on an *ex parte* basis in order to obtain approval to file certain records (the “Records”) under seal and *ex parte*.

To obtain permission from the Court to file anything under seal, the party seeking permission must provide the Court with a basis for granting the request. *See* Local Rule 26.2(b). Because of the nature of the Records, the government is unable to explain in this publicly-filed motion its rationale for why it wishes to provide the Records under seal and *ex parte*. Therefore, the government respectfully requests permission to file a separate motion explaining its reasons under seal and on an *ex parte* basis.

Respectfully submitted,

ROBERT A. ZINK  
Chief  
Criminal Division, Fraud Section  
U.S. Department of Justice

By: /s/ Avi Perry  
Avi Perry, Assistant Chief  
Scott Armstrong, Trial Attorney  
Criminal Division, Fraud Section  
U.S. Department of Justice  
Telephone: (202) 616-4619  
Email: avi.perry@usdoj.gov

Dated: April 13, 2020

**CERTIFICATE OF SERVICE**

I hereby certify that on April 13, 2020, I will cause the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will provide copies to counsel for all parties.

/s/ Avi Perry

Avi Perry, Assistant Chief  
U.S. Department of Justice  
Criminal Division, Fraud Section